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17 Defendants TransPerfect Global, Inc.,
TransPerfect Translations International, Inc.,
and Translations.com, Inc.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION

21 TRANSPERFECT GLOBAL, INC.,
22 TRANSPERFECT TRANSLATIONS
INTERNATIONAL, INC., AND
TRANSLATIONS.COM, INC..

Plaintiffs/Counterclaim
Defendants,

25

26 MOTIONPOINT CORPORATION

Defendant/Counterclaim Plaintiffs.

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Attorneys for Defendant/Counterclaim Plaintiff
MotionPoint Corporation

Case No. CV 10-02590 CW (JCS)

ELECTRONIC CASE FILING

**JOINT STIPULATION AND
[PROPOSED] ORDER MODIFYING
THE CASE SCHEDULE**

Judge: Hon. Claudia Wilken

1 Plaintiffs and Counterclaim Defendants TransPerfect Global, Inc., TransPerfect
 2 Translations International, Inc., and Translations.com, Inc. (collectively "TransPerfect") and
 3 Defendant and Counterclaim Plaintiff MotionPoint Corporation ("MotionPoint") hereby jointly
 4 move the Court to set certain dates in this case.

5 In light of extensive discovery to date, the parties have agreed to jointly request a
 6 modification of the schedule to allow the parties sufficient time to effectively schedule and
 7 complete depositions. This stipulation does not affect the current scheduled dates for
 8 submissions to the court and does not affect the current scheduled dates for dispositive motions,
 9 claim construction, or the trial date. By stipulation, the parties previously requested the Court
 10 modify the case schedule on October 7, 2011, which the Court granted on October 11, 2011. See
 11 Dkt. Nos. 94, 95. The parties have met and conferred and request that the Court enter the
 12 following schedule:

Event or Filing	Joint Proposed Dates
1) Fact Discovery Deadline ¹	May 25, 2012
2) Parties to Designate Experts	
Opening Expert Reports	June 11, 2012
Rebuttal Expert Reports (except for Rebuttal Damages Expert Reports)	July 2, 2012
1) Expert Discovery Deadline (except for Damages Experts)	July 13, 2012
2) Rebuttal Damages Expert Reports	
Damages Expert Discovery Deadline	July 19, 2012
Opening Briefs on dispositive motions for all claims and counterclaims and on claim construction due	July 26, 2012 (Unchanged)
Response Briefs due	August 9, 2012 (Unchanged)
Reply Briefs due	August 23, 2012 (Unchanged)

27 ¹ The deadline for serving written discovery requests shall remain unchanged and is based on the currently effective
 28 fact discovery deadline of April 26, 2012.

1	1) All case-dispositive motions to be heard at 2:00 P.M.	September 6, 2012
2	2) Case Management Conference	(Unchanged)
3	Final Pretrial Conference at 2:00 P.M.	November 21, 2012
4	10 day Jury Trial will begin at 8:30 A.M.	(Unchanged)

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Dated: April 6, 2012

McDERMOTT WILL & EMERY LLP

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/s/ Joel M. Freed
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*Attorneys for Defendant/Counterclaim Plaintiff
MotionPoint Corporation*14
Dated: April 6, 2012

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/s/ Joseph H. Lee
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*Attorneys for Plaintiffs/Counterclaim Defendants
TransPerfect Global, Inc.; TransPerfect Translations
International, Inc.; and Translations.com, Inc.*22
PURSUANT TO STIPULATION, IT IS SO ORDERED.23
Dated: _____24
Hon. Claudia Wilken
25
United States District Judge

1 I hereby attest pursuant to General Order 45.X.B. that concurrence in the electronic
2 filing of this document has been obtained from the other signatories.
3

4 Dated: April 6, 2012

/s/ Joseph H. Lee

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